

PCT Review of Alternatives

Summary of Comments

General Comments

1. Conceptual range of alts is adequate.
2. Cost considerations should be brought to table early. *(These are being analyzed.)*
3. Water supply implications should be more carefully evaluated. *(Later stages.)*
4. Generalities leave too many questions unanswered. *(This is the concept for the programmatic phase. Details of Core Actions and specific actions are being prepared.)*
5. Assessments should describe range of opinion or uncertainty with regards to benefits and effects; debates should be characterized. *(Qualifiers were presented in Constraints and Concern Sections. More details as to uncertainties and concerns will be presented in programmatic EIS.)*
6. Subalternatives should be used to show potential variability/options. *(Refinements can be made in the next stage of alternatives development.)*
7. Discussion should focus more on effects of resource subcomponents (e.g. which aspects of water quality). *(Clarifications were made to Benefits and Constraints where possible.)*
8. A lot of work should be done before the alternatives are released to public. *(Much editorial work was accomplished before the distribution of the Blue Book.)*
9. Make sure alternatives are balanced toward specific objectives; make sure substantial progress is made for each; provide more focus in alternatives descriptions as to how each addresses objectives: fully or lack thereof. *(Attempts were made to more fully balance the alternatives in the Blue Book; however, some differences in level of implementation and balancing among objectives remains.)*
10. Rather than leaving alternatives deficient, improve them to meet objectives. *(Improvements were made as best possible within the various themes represented by each alternatives.)*
11. There should be more links between resource discussion within alternatives. *(Such detail will be added later for the smaller set of alternatives.)*
12. Water reliability effects should be better articulated. *(More discussion in benefits to Water Supply in the new format.)*
13. The degree to which an objective is addressed should be stated up front. *(Program objectives are addressed in expanded benefits sections.)*
14. Core actions should be included in alternatives. *(Core actions and their role in meeting program objectives remain covered in a separate Core action document.)*

15. Group alternatives by level of effort. *(Alternatives remain ungrouped in the Blue Book; however, various summaries are being prepared that present the alternatives by categories and groups.)*
16. Highlight consistent themes or modules to reduce confusion and details. *(Highlights are shown in cover page summary of each alternative.)*
17. Theme could be more explicit. *(Summary sheets for alternatives highlights themes for each alternative.)*
18. Evaluation is a task for later. *(We continue to develop performance measures for use in evaluating alternatives in this phase of the program.)*
19. An ecosystem approach implies a balance among ecosystem components; don't substitute one for another. *(The alternatives as presented each adopt an ecosystem approach, but at different levels of implementation and facility approaches.)*
20. Water quality standards are not addressed and need to be in each alt. *(Water quality standards may or may not change with subsequent evaluation of the alternatives.)*
21. Actions are often described too generally. Actions need more "where, how, and how much". *(Detailed specification of actions are being developed. Level of implementation is being developed under performance measures.)*
22. Benefits are often misrepresented, misleading, or simply not accurate. *(We have improved the benefit statements.)*
23. There is a bias toward native species. *(Though the focus of the alternatives is often to improve habitat and reduce entrainment of native fishes, it is assumed that many of the actions for native fish will likewise benefit important non-native fish.)*
24. "Environmental Water" needs greater level of discussion and conceptual detail. *(Detailed specification and allocation of environmental water will be worked out at a later stage with input from technical advisory teams.)*
25. Adaptive management is an uncertain cure to a unproved action. *(Adaptive management is important because phasing in costly actions and making necessary adjustments is necessary to make the program cost effective.)*
26. How adverse are existing conditions and what are the problems. *(The ecosystem approach does not focus on how sick the patient is, but more on what treatments are necessary to bring health back to the system.)*
27. Short and long term goals should be addressed. *(Details of the short and long term aspects of the program will be developed later in the process, when details of implementing individual actions are developed.)*
28. More new actions are needed to meet objectives. *(New actions are continuously being considered for Core Actions as well as for alternatives. Action lists were revised for each alternative for the Blue Book.)*
29. Actions are inconsistently described between alts. *(Consistency was an objective for the Blue Book and more recent activities.)*

30. Some actions are inconsistent with recovery plans. *(We have made a detailed review of Core Actions and specific actions to make them consistent with recovery plans. Some actions may seem in conflict, but the degree of such conflicts have yet to be discussed among the various stakeholders.)*
31. How some actions will derive benefits is unclear. *(We have put more emphasis on benefit statements in the Blue Book.)*
32. Benefits of actions are sometimes overplayed/overstated; constraints are often misrepresented; negative consequence not analyzed or understated. Need to assess indirect effects: environmental effects of employing actions themselves. *(Again, benefit statements have been emphasized in the Blue Book.)*
33. More actions should be part of baseline or core. Conflicts occur with core actions. *(Core and Basic level of action modules in the set of 20 alternatives have been further developed.)*
34. There is a lack of detail on level of implementation. *(Further detail is being prepared for each action item; level of implementation has been prepared as part of the performance measure process.)*
35. More specific configuration of actions is needed. *(Again, more detail is being prepared on Core Actions and specific actions including implementation level.)*
36. Uncertainties should be related. *(Uncertainties have been added to Benefits and Constraint and Concern sections to a limited extent.)*
37. Need more specific information to convince us as to the value of the proposal. *(More details were added and continue to be added through the alternatives development process.)*
38. Too much reliance on unproved or even infeasible actions. *(The degree to which individual actions are determined to be feasible has yet to be determined, thus more discussion and evaluation will continue. Adaptive management will be a major focus of the program during implementation.)*
39. Problem with incorrect premises. *(Corrections of such problems will continue with input from the various review teams.)*
40. Need more clarification. *(Clarification will continue to occur through the ongoing process.)*
41. Need more evidence. *(Performance measures and level of implementation will focus some of these concerns. Others will be addressed in the Programmatic EIS, while others will only be resolved through the adaptive management and implementation of the program.)*

Specific Comments

1. Activity: Increase Eastside channel flood flow capacity (Alts 10, 11, 12, and 14).
Comment: *Channel capacity improvements may destroy or adversely modify delta smelt*

- critical habitat (USFWS letter comment 11)*. Response: Benefits were modified to indicate that channel alteration may include creation of shaded riverine aquatic habitat.
2. Activity: Shift in timing of exports - greater winter export (Alt 9). Comment: *The November to February period is still a period of concern for certain populations, especially spring-run and winter-run chinook salmon (NMFS p4)*. Response: Constraints and Concern for Alt 9 added that the alternative may increase export losses of chinook salmon.
 3. Activity: Concern for the stated benefits of Alternative 19. Comment: *Considerable evaluation is needed to demonstrate how realistic the stated benefits are (Chadwick Alt 19)*. Response: Uncertainty as to the level of improvement added to Constraints and Concerns.
 4. Activity: Operation of tide gates and flow barriers (Alts 19 and 20). Comment: *Flow barriers in south Delta would have adverse effect on fish (USFWS letter comment 1)*. Response: The need to verify benefits added to Considerations.
 5. Activity: Lack of fully isolated facilities (all alts except 8, 15, and 16). Comment: *For alternatives that do not include at least some form of an isolated facility, adverse hydrodynamic habitat conditions will continue and need to be identified in the assessment sections (Chadwick comment 11)*. Response: "Adverse hydrological conditions continue in the Delta due to south Delta exports" added to Constrains and Concerns of all alts except 8, 15, and 16.
 6. Activity: Concern for fish screens (all alts). Comment: *Installation of fish screens will protect many adult and juvenile fish but would not protect larvae of fish species (USFWS letter comment 1C)*. Response: Addressed in Constraint and Concerns: "Fish entrainment is reduced but still a concern" (all alts). "Larvae of some important fish species remain vulnerable to entrainment" (Alts 8, 10, 11, 12, and 16).
 7. Activity: In-Delta water storage (Alt 8). Comment: *Need to account for potential of generating poor quality water in Chain-of-Lakes (PCT meeting notes)*. Response: Benefit statement modified to include "to the extent water quality is not degraded on islands".